

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**STEVEN ARONSON, MATTHEW  
ARONSON,**

**Plaintiffs,**

**v.**

**JJMT CAPITAL LLC, a Delaware limited  
liability company, JACOB WUNDERLIN,  
MATTHEW SCHWEINZGER, JOSEPH  
DEALTERIS, TYLER CROOKSTON,**

**Defendants.**

**Case No. 21-CV-01867**

**Hon. Franklin U. Valderrama**

**UNOPPOSED MOTION TO EXTEND DISCOVERY DEADLINES**

Plaintiffs, Steven Aronson and Matthew Aronson, by and through undersigned counsel, submit the following Motion to Extend Discovery Deadlines. In support, Plaintiffs state as follows:

1. On September 13, 2021, the Court entered a Scheduling Order that, among other things, set a fact discovery deadline date of April 29, 2022. [Dkt. #41].
2. Since that Scheduling Order, Plaintiffs have issued written discovery to all Defendants.
3. Defendants have served written responses and objections to Plaintiffs' written discovery requests.
4. To date, however, Defendants have not produced any documents pursuant to Plaintiffs' Rule 34 Requests for the Production of Documents.
5. On February 7, 2022, Defendant Tyler Crookston filed an Opposed Motion to Stay. [Dkt. #59]. Defendants JJMT, deAlteris, Wunderlin, and Schweinzger subsequently joined in that motion.

6. On February 8, 2022, the Court entered an Order providing that Plaintiffs' Response to the Motion to Stay is due by February 22, 2022, and that any Reply is due by March 1, 2022. [Dkt. #62].

7. On February 11, 2022, Plaintiffs' counsel held a meet-and-confer conference with counsel for JJMT Capital, LLC, Joseph deAlteris, Jacob Wunderlin, and Matthew Schweinzger; the second meet and confer meeting that Plaintiffs' counsel conducted with said defendants. The purpose of the meet and confer conference was to address the outstanding document production. During that meet-and-confer conference, counsel informed Plaintiffs' counsel that JJMT, deAlteris, Wunderlin, and Schweinzger had approximately 47,000 documents to review, however, they would not be producing any documents until such time that the Court rules on the Motion to Stay. Likewise, on February 14, 2022, counsel for Tyler Crookston ("Crookston") stated that Crookston would not produce documents until the Court ruled on the Motion to Stay.

8. Plaintiffs disagree with Defendants' position regarding the production of documents, particularly due to the fact that Magistrate Judge Susan E. Cox entered a Minute Order on February 8, 2022, explicitly stating that the April 29, 2022, fact discovery deadline remains set. [Dkt. #61].

9. In light of Defendants' position that they will not produce documents in response to the Rule 34 Requests for Production of Documents at any time in the near future, and in light of the fact that it will likely be several weeks before Defendants are able to review the approximate 47,000 documents, prior to any production, Plaintiffs are uncertain as to when, if at all, they will receive documents or otherwise be able to meaningfully address any alleged deficiencies in such production. In any event, it is highly unlikely Plaintiffs will be receiving documents before the middle of March.

10. Accordingly, Plaintiffs have a good-faith basis to believe that they may be unable to comply with the original fact discovery deadline of April 29, 2022.

11. Therefore, Plaintiffs respectfully request that the Court extend the fact discovery deadline 90 days, as well as all other discovery deadlines.

12. On February 15, 2022, a copy of this Motion was circulated to counsel for all Defendants and Defendants' counsels indicated they have no objection to the relief being sought in this Motion.

WHEREFORE, for the reasons stated in this Motion, Plaintiffs respectfully request that the Court grant this Motion to Extend Discovery Deadlines and enter an Order extending all discovery deadlines 90 days.

DATED: February 15, 2022

Respectfully submitted,

**MATTHEW ARONSON AND STEVEN ARONSON**

By: /s/ Daniel S. Rubin  
One of its Attorneys

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on February 15, 2022, the above **Motion to Extend Discovery Deadlines** was filed with the Clerk of the United States District Court for the Northern District of Illinois, and was served on counsel for all parties via the Clerk's ECF System.

/s/ Daniel S. Rubin

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